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March 17, 2022

Hon. Edward S. Kiel, U.S.M.J.
United States District Court, District of New Jersey
2 Federal Square, Courtroom 8
Newark, NJ 07102

Via: ECF

Re: Al Ummah Community Center et al. v. Teaneck et al.,
Civ. No.: 20-cv-14181 (KM)(ESK)

Dear Judge Kiel,

I hope this correspondence finds you well. I represent the Plaintiffs and write to request a conference with the court to address the Defendants' failure to comply with discovery demands. By way of background, on October 25, 2021, Plaintiffs propounded Deposition Notices, Document Requests and Interrogatories upon all Defendants in accordance with the Court's Order. Plaintiffs yet again provided the discovery demands to the Individual BOA Defendants new counsel on January 20, 2022. To date, none of the Individual BOA Defendants have provided a response to either the Document Request or the Interrogatories. Furthermore, while Defendants Teaneck and Melfi have provided some documents, they have not provided formal responses to either the Document Requests or the Interrogatories, and more documents remain outstanding. In addition, while Defendant BOA has responded to Interrogatories only, their response remains wholly deficient. In addition, the BOA produced some documents, but no response to Plaintiff's Document Demands.¹ I contacted counsel for Defendant BOA several times regarding meeting and conferring over the last month, but he has yet to respond to me.

Earlier this week I again contacted counsel for all Defendants regarding the Defendants' respective failure to respond to discovery. To date, I have not received a response. There is only three months left before the fact discovery deadline.

¹ Without the benefit of formal responses to document demands that cite to the relevant documents, Plaintiffs are left to guess as to which document is responsive to each request. This is a direct violation of the Defendants' discovery obligations where they are required to specifically identify the responsive documents to each request.

In addition, while Defendants evade their discovery obligations, they continue to pursue erroneous arguments in their motions to dismiss. Defendants are withholding discovery that will no doubt help defeat their motions. In addition, this Court was very clear in numerous conferences that discovery would not be stayed pending motion practice. Notwithstanding the Court's Orders, Defendants have apparently taken it amongst themselves to impose a practical stay by not responding to discovery. In light of the foregoing, Plaintiffs respectfully request a conference to address the foregoing and to stay motion practice until such time as Defendants completely comply with their discovery obligations.

Respectfully submitted,
s/Aymen A. Aboushi
Aymen A. Aboushi, Esq.

Cc: All counsel of record via ECF